

Federal Defenders
OF NEW YORK, INC.

Southern District
52 Duane Street, 10th Floor
New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

Tamara L. Giwa
Executive Director

Jennifer L. Brown
Attorney-in-Charge

June 25, 2024

VIA ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Jose Rivera
24 Cr. 222 (JGK)**

Dear Judge Koeltl,

Mr. Rivera was presented before Magistrate Judge Aaron for the above-captioned case on 6/28/24 March 12, 2024. See Dkt. Nos. 3, 4. On the consent of both parties, Mr. Rivera was released that same day on a bail package, which included home detention with GPS monitoring. See Dkt. No. 4.

I write to respectfully request a temporary modification of Mr. Rivera's home detention condition, so that he may spend the day at an amusement park, located within the Southern District of New York, with his family for his twin daughters' birthday, on July 5, 2024, from 12pm to 11pm (including travel time).

Undersigned counsel sought the position of Pretrial Services regarding this request. Officer Jonathan Lettieri informed me that Pretrial has a policy to oppose social event requests for supervisees on home detention. But, Officer Letteri also confirmed that Mr. Rivera has been in full compliance with the terms of his supervision to date. The government, by Assistant United States Attorney James Mandilk, defers to Pretrial.

If this application is approved, Mr. Rivera will provide Pretrial Services with the exact address of the amusement park and any other requested details.

Thank you for your consideration.

Respectfully submitted,
/s/
Sylvie Levine
Attorney for Mr. Rivera
212-417-8729

*Application denied.
The social exception would be
inconsistent with the requirement
of home detention which itself
should be the least restrictive
condition to satisfy the
purposes of pre-trial release.
So ordered. JLB/letti/U.S.D.S.*